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Attorneys for Defendant,
CITISTAFF SOLUTIONS, INC.

STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ AND
LAMAR PATTERSON

Plaintiffs,

v.

TESLA, INC. DBA TESLA MOTORS,
INC., CITISTAFF SOLUTIONS, INC.;
WEST VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES,
INC.; NEXTSOURCE, INC.; and
DOES 1-10, inclusive

Defendants.

Case No. 17-cv-06748-WHO

**JOINT STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE TO FILE
DISCOVERY DISPUTE LETTER**

FAC Filed:
Trial Date:

December 26, 2018
March 2, 2020

1 Pursuant to Northern District of California Civil Local Rules 6-2 and 7-12, Plaintiffs
2 DEMETRIC DI-AZ and OWEN DIAZ (“Plaintiffs”) and Defendant CITISTAFF SOLUTIONS,
3 INC. (“Citistaff”), by and through their respective counsel, hereby stipulate and agree as follows:

4 WHEREAS, Plaintiff filed the First Amended Complaint on December 26, 2018. (Dkt. No.
5 57). Defendant Answered the First Amended Complaint on January 1, 2019. (Dkt. No. 63).

6 WHEREAS, the Court’s July 17, 2019 Civil Pretrial Order set the fact discovery cutoff for
7 October 11, 2019. (Dkt. No. 78.)

8 WHEREAS, Civil Local Rule 37-3 provides that parties must file all motions to compel
9 discovery no more than 7 days after the fact discovery cut-off date.

10 WHEREAS, pursuant to Civil Local Rule 37-3 and the Civil Pretrial Order, all discovery
11 disputes must be raised with the Court no later than October 18, 2019.

12 WHEREAS, Plaintiffs initiated the meet and confer process regarding Citistaff’s objections
13 to Plaintiffs’ Third Amended Notice of Videotaped Deposition of Citistaff Solutions, Inc.’s Person
14 Most Knowledgeable Pursuant to Fed. R. Civ. P. 30(B)(6); and Request for Production of
15 Documents on September 6, 2019 (the “PMK Deposition Notice”).

16 WHEREAS, Plaintiffs and Citistaff met and conferred in person in an attempt to resolve
17 their dispute on September 9, 2019.

18 WHEREAS, Plaintiffs and Citistaff are continuing the meet and confer process, and seeking
19 to come to a compromise without enlisting the Court’s assistance.

20 WHEREAS, Plaintiffs and Citistaff believe that they can reduce or eliminate the need to
21 enlist the Court’s assistance in resolving their dispute if they have additional time to meet and confer
22 regarding Citistaff’s objections to the PMK Deposition Notice.

23 WHEREAS, Plaintiffs and Citistaff agree to extend Plaintiffs’ deadline to raise their dispute
24 regarding Citistaff’s objections to the PMK Deposition Notice to October 30, 2019, to allow the
25 parties additional time to negotiate an informal resolution of their dispute.

26

27 NOW THEREFORE, Plaintiffs and Citistaff hereby agree and stipulate as follows:

28 1. Plaintiffs’ deadline to raise a dispute with the Court with respect to Citistaff’s objections to

1 Plaintiffs' Third Amended Notice of Videotaped Deposition of Citistaff Solutions, Inc.'s
2 Person Most Knowledgeable Pursuant to Fed. R. Civ. P. 30(B)(6); and Request for
3 Production of Documents is extended to October 30, 2019.

4
5 **IT IS SO STIPULATED.**
6
7

8 Dated: October 18, 2019

CALIFORNIA CIVIL RIGHTS LAW GROUP

9
10 By /s Navruz Avloni
11 Lawrence A. Organ
12 Navruz Avloni
13 Attorneys for Plaintiffs
14 DEMETRIC DI-AZ and OWEN DIAZ

15 Dated: October 18, 2019

LAFATETTE & KUMAGAI

16
17 By /s Cheryl Stevens
18 Gary Lafayette
19 Cheryl Stevens
20 Susan Kumagai
21 Attorneys for Defendant
22 CITISTAFF SOLUTIONS, INC.

23 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**
24

25 DATED: _____

HONORABLE WILLIAM H. ORRICK